

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

<b>ARROWOOD INDEMNITY CO.</b>	)	
<b>SUCCESSOR TO TUITIONGUARD</b>	)	
Plaintiff	)	
	)	
<b>Vs.</b>	)	<b>Case No. 2:11-cv-00101-WC</b>
	)	
<b>RICHARD A. STEHL</b>	)	
Defendant	)	
	)	

**ANSWER TO COMPLAINT**

Comes now the Defendant, Richard A. Stehl, who in answer to the Complaint states unto the Court as follows:

1. The Defendant, Richard A. Stehl, denies the allegations of the Complaint and demands strict proof thereof.

**AFFIRMATIVE DEFENSES**

1. The debt claimed has been discharged in bankruptcy. The Defendant, Richard A. Stehl, filed his Chapter 7 bankruptcy petition in the Bankruptcy Court for the Middle District of Alabama on October 15, 2005, case no. 05-33989-WRS. He received an order of discharge in the bankruptcy case on February 7, 2006. The case was a no asset case.

2. The claim is barred by the applicable statute of limitations.
3. The Plaintiff does not have the authority to bring this action.
4. The Defendant states that the Plaintiff is not the proper legal entity to bring this action.
5. The Defendant states that the Plaintiff is not a proper legal entity to bring this action.
6. The Defendant alleges the defense of waiver.
7. The Defendant alleges the defense of laches.
8. The Defendant alleges statute of frauds.

Done this the 17<sup>th</sup> day of February, 2011.

/s/ Richard A. Lawrence

Richard A. Lawrence

Attorney for Defendant Richard A. Stehl

**OF COUNSEL;**

Richard A. Lawrence LAW006  
608 South Hull Street  
P.O. Box 4633  
Montgomery, AL 36103  
(334) 263-2000  
Fax: (334) 263-9086  
richard@rlawrencelaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the following parties listed below by placing a copy of the same in the United States Mail, first class postage prepaid and properly addressed, or by electronic mail on this the 17<sup>th</sup> day of February, 2011:

Leonard M. Schwartz  
1609 Richard Arrington Jr. Blvd. South  
Birmingham, AL 35205

/s/ Richard A. Lawrence

Richard A. Lawrence

Attorney for the Plaintiff